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6 Attorney for Marion D. Reedus, II
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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 MARION D. REEDUS, II,

14 Defendant.
15

Case No. 2:17-cr-00248-KJD-CWH

UNOPPOSED MOTION AND
PROPOSED ORDER TO MODIFY
THE SPECIAL CONDITIONS OF
PRETRIAL DIVERSION
AGREEMENT

16 COMES NOW the Defendant, Marion D. Reedus, II, by and through undersigned
17 counsel, Nisha Brooks-Whittington, Assistant Federal Public Defender, and hereby moves to
18 modify the special conditions of his pretrial diversion agreement.

19 This unopposed motion is entered for the following reasons:

20 1. On August 9, 2017, Mr. Reedus made his initial appearance on a criminal information
21 charging him with a misdemeanor crime of theft of government money in violation of 18 U.S.C.
22 § 641. ECF Nos. 1, 3. Mr. Reedus entered into a pretrial diversion agreement with the
23 government regarding the charge. ECF Nos. 3, 5. The court approved the agreement for pretrial
24 diversion.

25 2. The pretrial diversion agreement contains general and special conditions. ECF No.
26 5. One of the special conditions requires Mr. Reedus to resolve any active warrants within 60

1 days and provide verification to his pretrial services officer. *Id.* This special condition must be
2 satisfied by October 8, 2017.

3 3. Mr. Reedus has resolved all but one of his active warrants and is unable to resolve
4 the last warrant by October 8, 2017, as he is financially unable to do so. As a result, Mr. Reedus
5 requests an additional 30 days to resolve his active warrant.

6 4. The government and pretrial services do not oppose this request to extend the time
7 for Mr. Reedus to resolve his active warrant by 30 days.

8
9 DATED this 6th day of October, 2017.

10 RENE L. VALLADARES
11 Federal Public Defender

12 By: /s/ Nisha Brooks-Whittington

13 NISHA BROOKS-WHITTINGTON
14 Assistant Federal Public Defender
15 Attorney for Marion D. Reedus, II.
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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

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6 MARION D. REEDUS, II,

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Case No. 2:17-cr-00248-KJD-CWH

PROPOSED ORDER TO MODIFY
THE CONDITIONS OF PRETRIAL
DIVERSION AGREEMENT

8 **ORDER**

9
10 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the special conditions
11 of the pretrial diversion agreement be modified to extend the time for resolving any active
12 warrants by 30 days from the date of October 8, 2017.

13 DATED October 10, 2017

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18 UNITED STATES MAGISTRATE JUDGE

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That on October 6, 2017, he served an electronic copy of the above and foregoing

UNOPPOSED MOTION AND PROPOSED ORDER TO MODIFY THE SPECIAL

CONDITIONS OF PRETRIAL DIVERSION AGREEMENT by electronic service (ECF)

to the person named below:

/s/ Brandon Thomas
Employee of the Federal Public Defender